



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 28, 2019

Michael Novak
Authorized Representative for ICA TriNova, LLC.
Keller and Heckman LLP
1001 G Street NW, Suite 500 West
Washington, DC 20001

Subject: Label Amendment – Minor label amendments
Product Name: FRUITGARD
EPA Registration Number: 79814-5
Application Date: July 1, 2019
Decision Number: 554357

Dear Mr. Novak:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Melanie Bolden by phone at (703) 347-0165, or via email at Bolden.Melanie@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Wanda G. Fuller, for". The signature is written in a cursive style.

Demson Fuller, Product Manager 32
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure

FruitGard®

Post-Harvest Treatment Bactericide/Fungicide For Indoor Use Only

Active ingredient - Sodium Chlorite	3.2%
Other Ingredients	96.8%
<hr/> Total	<hr/> 100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

**See back panel for additional precautionary
statements and First Aid statements.**

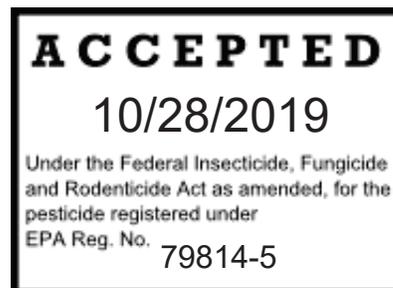
NET WT __ lbs (__ kg)

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EPA Est. No. 79814-GA-001

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FruitGard®

PRECAUTIONARY STATEMENTS

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear (specify protective eyewear, if applicable). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Harmful if inhaled. Avoid breathing vapors. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

USER SAFETY RECOMMENDATIONS: After handling wash hands thoroughly with soap and water and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing immediately and wash clothing before reuse. Remove PPE immediately after handling this product, wash outside of gloves before removing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators and other handlers must wear: Long-sleeved shirt and long pants, Shoes plus socks; and Waterproof gloves.

ENGINEERING CONTROLS

DO NOT mix with acid or other chemicals except as provided for in the “Directions for Use”. Uncontrolled mixing with acids or other chemicals may cause evolution of chlorine dioxide gas that may be poisonous or explosive. NEVER trap chlorine dioxide gas in a closed container, trapped gas may overpressure and decompose releasing enough heat to cause fire.

FIRST AID

If in Eyes	<ul style="list-style-type: none">• Hold eyes open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing.• Call a poison control center or doctor for treatment advice.
If Inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
If on Skin	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center, or doctor, or going for treatment.

You may also contact: 1-800-373-7542 for emergency medical treatment information.

ENVIRONMENTAL HAZARD

This product is toxic to fish, aquatic invertebrates, oysters and shrimp.

DIRECTIONS FOR USE

It is a violation of Federal law to use the product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons.

Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Personnel must vacate the treatment space during the fumigation process until chlorine dioxide levels are at or below the EPA RfC 0.1 ppm or wear a NIOSH/MSHA approved respirator for chlorine dioxide. Chlorine dioxide levels in air can be measured with a Model C16 Pota Sans II chlorine dioxide gas leak detector or equivalent measuring device.

Personal Protective Equipment required for early entry to treated areas is:

- NIOSH/MSHA approved respirator for chlorine dioxide;
- Long-sleeved shirt and long pants;
- Shoes plus socks; and
- Waterproof gloves.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

FruitGard® granules are designed to release low levels of chlorine dioxide (ClO₂) gas. Chlorine dioxide gas generated from FruitGard® is effective in the control of microorganisms responsible for contamination, decay and spoilage of listed crops during the storage and shipment of these raw agricultural commodities. Required dosages vary depending on the commodity to be treated and as outlined in the table below. These directions address the use and activation of these granules for treating raw agricultural commodities.

Treat in a suitable dark space (less than 5 lumens). Two such treatment sites are Storage Rooms and Shipping Containers. Fill treatment space with the commodity to be treated. Chlorine dioxide gas condenses rapidly on the surfaces of raw agricultural commodities, so it is necessary to have air circulation over and through produce during fumigation.

Acid activation increases the release rate of chlorine dioxide from FruitGard®. To activate FruitGard® add liquid or solid acid activators such as Z-Series™ ZF or Z-Series™ ZPA. Activate FruitGard® material only at the point of application.

AVOID BREATHING FUMES.

DO NOT combine or mix acidifiers and FruitGard® in closed containers or mixers. NEVER trap chlorine dioxide gas in a closed container, trapped gas may overpressure and decompose releasing enough heat to cause fire.

Commodities, Application Rates, and Application Times

FruitGard® Application Table:

Commodity	Application Rate (Grams of product / Kg of crop)	Minimum Treatment Time	Application Notes
Tomatoes	0.01 - 6.0	3 hours	Use maximum rate for severe decay conditions
Potatoes	0.01 – 1.0	6 hours	Use maximum rate for severe decay conditions
Cantaloupes	0.01 - 12	6 hours	Use maximum rate for severe decay conditions

Treatment Procedure:

1. Place modified reactor in the Treatment Container holding the listed commodity to be treated in a way that allows gas to freely migrate across the produce. A modified reactor is a breathable sachet (such as Tyvek®), an open mixer, or a plastic container (pail, drum, box, etc.) with a vented cover that allows for the release of chlorine dioxide gas. For very large quantities of produce, use of multiple reactors is recommended.
2. Place the measured amount of FruitGard® into the modified reactor.
3. When activating FruitGard®, add the measured amount of either liquid food grade acid or solid acid impregnate material to the modified reactor containing the FruitGard® as shown below:
 - a) Liquid food grade acid:
 - i. Add 1 ounce of 50% (wt/wt) citric acid solution per 2.2 lbs (1,000 grams) of FruitGard®, or
 - ii. Add ½ ounce of 75% (wt/wt) phosphoric acid per 2.2 lbs (1,000 grams) of FruitGard®.
 - b) Solid acid impregnate:
 - i. Mix equal weights of FruitGard® and the solid acid impregnate material (e.g., ICA-TriNova, LLC Z-Series™ ZF or Z-Series™ ZPA).

4. Mix the materials. - chlorine dioxide released from FruitGard® will accelerate once mixed.
5. Close the Treatment Container and provide signage about no entry without specified PPE prior to end of treatment. Treat commodity for the time specified in the FruitGard® Application Table.
6. When the fumigation is complete, unseal the space. (To confirm the chlorine dioxide concentration is at or below 0.1 ppm using ClO₂ detection coupons or a Model C16 Pota Sans II chlorine dioxide gas leak detector or equivalent measuring device.)

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool (preferably <75°F), dry, well-ventilated area away from heat, or open flame or combustible materials. Keep container sealed when not in use. Keep dry.

PESTICIDE DISPOSAL: Pesticide wastes from unused, partially used or spilled material are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Then offer for recycling if available or puncture and dispose of in a sanitary landfill.

WARRANTY CONDITIONS OF SALE

OUR RECOMMENDATIONS FOR THE USE of this product are based upon tests believed reliable. Follow directions carefully. Buyer assumes all risks of use, storage and handling of this material not in strict accordance and direction given herewith. In no case shall ICA-TriNova, LLC or the seller be liable for consequential, special or indirect damage resulting from the use or handling of this product when use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by ICA-TriNova, LLC and is accepted by the buyer.

TRADEMARK DESIGNATIONS

FruitGard is a registered trademark of ICA-TriNova LLC. Z-Series™ ZF (a hydrochloric acid impregnate) , Z-Series™ ZPA (a phosphoric acid impregnate) are trademarks of ICA-TriNova LLC.

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